THE HONORABLE BENJAMIN H. SETTLE 1 2 3 4 UNITED STATES DISTRICT COURT 5 FOR THE WESTERN DISTRICT OF WASHINGTON TACOMA DIVISION 6 7 WILL CO. LTD. a limited liability company Case No. 3:20-cv-05802- BHS 8 organized under the laws of Japan, 9 DEFENDANTS' COUNSEL'S Plaintiff, UNOPPOSED MOTION TO 10 WITHDRAW v. 11 NOTE ON MOTION CALENDAR: KA YEUNG LEE, an individual; YOUHARA May 24, 2024 12 MARKETING AND PROMOTION LIMITED, a foreign company; and DOES 1-20 d/b/a 13 THISAV.COM 14 Defendants. 15 COMES NOW counsel for Defendants Ka Leung Lee and YouHaHa Marketing and 16 Promotion Limited ("Defendants"), by and through their undersigned counsel, and 17 respectfully submit this Motion to Withdraw. In support of this motion, counsel for 18 defendants state as follows: 19 1. The undersigned have represented Defendants in the present action from the time 20 that the litigation was filed. 21 2. More than one year ago, Defendant Ka Yeung Lee, a permanent resident of 22 Hong Kong, sold the website involved in the underlying litigation. 23 3. Although the parties had hoped that a resolution of the present case might be 24 possible, efforts towards a settlement were unsuccessful. 25 4. Plaintiff has moved for leave to amend its complaint to add additional 26 defendants, including the owners of additional websites. The undersigned do not 27 28

1		represent any of those proposed new defendants.		
2	5.	5. Defendants have instructed the undersigned counsel to cease all work on this		
3		matter and to withdraw from their representation in this case.		
4	6.	In accordance with General Rule 2, the undersigned hereby certify that they have		
5		advised defendants that their withdrawal may result in an entry of default against		
6		them.	, , , , , , , , , , , , , , , , , , ,	
7	7.		the undersigned hereby certify that they have	
8		served Defendants with a copy of this motion via email.		
9	8	Plaintiff does not oppose the relief requested in this motion.		
10		ccordingly, the undersigned counsel move for withdrawal from the present case.		
11		ated May 24, 2024	Respectfully submitted,	
12		ated 1714y 2-1, 202-1	-	
13			<u>/s/ Philip P. Mann</u> Philip P. Mann, WSBA No: 28860	
14			Mann Law Group PLLC 403 Madison Ave. N. Suite 240	
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18			/s/ Valentin Gurvits	
19			Valentin D. Gurvits <i>pro hac vice</i>	
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25			/s/ Evan Fray-Witzer	
26			Evan Fray-Witzer pro hac vice	
27			CIAMPA FRAY-WITZER, LLP 20 Park Plaza, Suite 505	
28			Mann Law Group PLLC	

Motion to Withdraw Cause No. 20-CV-05802-BHS Mann Law Group Pllc 403 Madison Ave N. Ste 240 Bainbridge Island, WA 98110 Phone: 206-436-0900

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CERTIFICATE OF SERVICE I hereby certify on the date indicated below, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties who have appeared in this matter. DATED: March 11, 2021 /s/ Philip P. Mann

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